



July 2, 2009

Record Center, Pipeline and Hazardous  
Materials Safety Administration, U.S.  
Department of Transportation,  
Washington, DC 20590

RE: SP 14860-N

Ladies and Gentlemen:

Chugachmiut, Inc. is an Alaska non-profit. We administer a Federal Compact under Public Law 93-638 for the benefit of Alaska Natives residing in seven Villages and communities throughout Prince William Sound and Lower Cook Inlet. Our region encompasses over 15,000 square miles, which is an area larger than Maryland. Our weather systems include some of the most severe in the world, including hurricane force winds, rainfall in excess of 60 inches annually and snowfall exceeding 18 feet in some years.

Our regional Clinic is located in Seward, Alaska, and we have Clinics in 4 Villages ranging in size from 55 to 260 residents.

Chugachmiut is supporting the request by Alaska Airlines for Special Permit Referenced #14860-N, which would "authorize the transportation in commerce of cylinders of compressed oxygen and oxidizing gases without rigid outer packaging when no other means of transportation exist."

For 2 Villages served by Chugachmiut and located in Prince William Sound, transportation to and from the Villages must be either by water or air. Water transportation is by Alaska State Ferry, is not scheduled, and requires travel from Anchorage to Whittier, Alaska in order to board the Ferry. An employee will most likely have to accompany the oxygen on the ferry. Air transportation is through a Part 135 Air Taxi operator utilizing twin engine Cherokee Chieftain aircraft. Both private marine vessels and aircraft can also be chartered to each Village. The expense is significant.



For 2 Villages located in Lower Cook Inlet, transportation to and from the Villages is also by either water or air. 2 Part 135 Air Taxi operators serve the Villages hourly and by special charter. The operators utilize single engine Cessna 206/207 aircraft. Water transportation is only by private charter for watercraft.

Any scenario for transportation of oxygen bottles using the bulky packaging causes problems, ranging from a considerably increased expense to a total inability to supply oxygen when needed. Our patients will suffer as a consequence. Some of the aircraft we utilize will not accommodate the larger oxygen cylinders we use for our clinics and require shipment using water carriers and considerable time and expense.

We are hopeful that the U.S. Department of Transportation (DOT) will understand that the challenges of compliance with the rule in Alaska are considerable, and grant the request for Special Permit #14860-N to allow a reasonable exception to the rule in Alaska for the delivery of essential medical gases to our Villages.

Sincerely,

A handwritten signature in black ink, reading "Patrick M. Anderson". The signature is fluid and cursive, with a large initial "P" and "A".

Patrick M. Anderson  
Executive Director

cc. Don Kashevarof, CEO  
Alaska Native Tribal Health Consortium

Evangelyn "Angel" Dotomain, President/CEO  
Alaska Native Health Board

Marilyn Walsh Kasmar, President  
Alaska Primary Care Association